

United States Hispanic Chamber of Commerce

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FEDERAL COMMUNICATIONS COMMISSION
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President/CEO

July 27, 1994

William A. Caton, Acting Secretary
Federal Communications Commission, Room 222
1919 M Street, NW
Washington, D.C. 20554

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RE: RM No. 8491

Dear Mr. Caton:

Attached please find the original and seven copies of Reply Comments of the United States Hispanic Chamber of Commerce in the above referenced proceeding.

Thank you.

Sincerely,


José F. Niño
President/CEO

No. of Copies rec'd 0 + 4
List A B C D E

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EX-107 (Rev. 10-27-80)

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JUL 27 1994

Before the
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

PETITION FOR RULEMAKING TO ADAPT
THE SECTION 214 PROCESS TO THE
CONSTRUCTION OF VIDEO DIALTONE
FACILITIES

RM No. 8491

PETITION FOR RELIEF FROM UNJUST
AND UNREASONABLE DISCRIMINATION
IN THE DEPLOYMENT OF VIDEO
DIALTONE FACILITIES

To: The Commission

REPLY COMMENTS OF U.S. HISPANIC CHAMBER OF COMMERCE

In this Reply, the U.S. Hispanic Chamber of Commerce ("USHCC") responds to the initial comments filed in this proceeding. The USHCC is the preeminent Hispanic business organization representing more than 650,000 Hispanic-owned businesses in the U.S. and Puerto Rico. Through its network of nearly 200 local Hispanic chambers of commerce across the country, the USHCC is the umbrella organization that actively promotes the economic growth and development of Hispanic entrepreneurs.

The USHCC has a stake in the telecommunications industry. Hispanic businesses are moving away from stereotypical service-sector jobs and into high technology fields such as telecommunications. Furthermore, as consumers, Hispanics stand to gain from the information superhighway. Bilingual education, English-as-a-second-language courses, and inner-city schools all could be improved by the addition of new telecommunication technology.

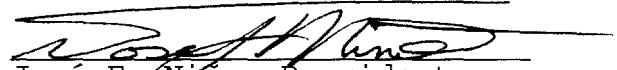
The USHCC requests issuance of a Notice of Inquiry rather than a Notice of Proposed Rulemaking with respect to petitioners' allegations that video dialtone networks are being deployed discriminatorily. The reason an inquiry is more appropriate than a rulemaking is that we believe the specific measures proposed by petitioners to prevent discriminatory deployment are overly regulatory and could thus retard network deployment to the detriment of all consumers, including small businesses such as those USHCC represents. The USHCC would prefer, to the maximum extent possible, to let businesses do business and to avoid government paperwork. Extensive regulatory proceedings are likely to increase the cost of services, micro-manage network planning, and ultimately delay network deployment.

If the investigation that results from the notice of inquiry determines that discriminatory network deployment exists, the USHCC urges the agency to keep three principles in mind as it considers ways to eliminate such discrimination, as follows:

- It should seek to prevent discrimination in ways that do not slow the deployment of new technologies to all consumers.
- It should promote minority ownership and participation in new technologies, as it has in PCS auctions, as a means of promoting development and use of new networks in minority communities.
- It should establish goals and guidelines for achieving universal deployment of these technologies and services

in ways that encourage opportunities for minority owned businesses.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "José F. Nino", is written over a horizontal line.

José F. Nino, President
U.S. HISPANIC CHAMBER OF COMMERCE
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July 27, 1994

CERTIFICATE OF SERVICE

I certify that a copy of the attached "REPLY COMMENTS OF U.S. HISPANIC CHAMBER OF COMMERCE" was mailed on July 27, 1994, by first class mail to the following:

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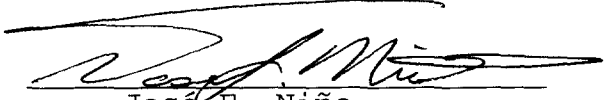
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